

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Team Systems International, LLC,

Debtor.

Chapter 7

Case No. 22-10066 (CTG)

Re: D.I. 272

George L. Miller, solely in his capacity as the  
Chapter 7 Trustee of Team Systems International,  
LLC,

Plaintiff,

-against-

Deborah Evans Mott, Steven M. Acosta,  
Christopher Mott, John S. Maciorowski,  
Addy Road LLC, Brent Road LLC,  
Benjamin P. Smith, Jessica M. Smith, and  
TSI Gulf Coast, LLC, and

John Does 1-100,

Defendants.

Adv. Proc. No. 23-50004 (CTG)

Re: Adv. D.I. 3

**CHAPTER 7 TRUSTEE'S EXHIBIT AND WITNESS LIST  
FOR JANUARY 23, 2023 HEARING**

George L. Miller, solely in his capacity as the Chapter 7 Trustee (the "Trustee") of the bankruptcy estate Team Systems International, LLC and Plaintiff in the above-captioned adversary proceeding, may introduce the following exhibits and witness testimony in support of the *Motion of the Chapter 7 Trustee for Entry of an Order (i) Extending the Freeze and Granting Preliminary Injunctive Relief, and (ii) Granting Related Relief, Pursuant to 11 U.S.C. § 105(a) and Fed. R.*

*Bankr. P. 7016* [Main Case D.I. 272; Adv. D.I. 3]. The following list does not include documents or other evidence used solely for impeachment purposes.

**TRUSTEE'S EXHIBIT LIST<sup>1</sup>**

<b>Exhibit #</b>	<b>Title/Description</b>	<b>Reference</b>
	Declaration of William A. Homony	Main Case D.I. 273; Adv. D.I. 4
A	April 2018 statement BBVA account ending -8953 (p. 2 of 5)	
B	Printout from the public website of the Volusia County (Florida) Property Appraiser regarding Ormond Beach Property	
C	June 2019 statement BBVA account ending -7954 (p. 2 of 3)	
D	July 2019 statement BBVA account ending -7965 (p. 2 of 3)	
E	July 2019 statement BBVA account ending -9759 (p. 2 of 3)	
F	June 2019 monthly transaction report BBVA account ending -7965 (TSI000860)	
G	July 2019 monthly transaction report BBVA account ending -7965 (TSI000859)	
H	July 2019 monthly transaction report BBVA account ending -9759 (TSI000901)	
I	Addy Road Property Deed dated July 22, 2019	
J	June 2020 statement BBVA account ending -7965 (p. 2 of 5)	
K	August 2020 statement BBVA account ending -7965 (p. 2 of 3)	
L	August 2020 statement BBVA account ending -9759 (p. 2 of 4)	
M	Blue Springs Property Deed dated August 10, 2020	
N	May 2018 statement BBVA account ending -8953 (p. 2 of 5)	
O	May 2018 monthly transaction report BBVA account ending -8953 (TSI000936 to TSI000937)	
P	July 2018 statement BBVA account ending -9759 (p. 2 of 4)	
Q	August 2018 statement BBVA account ending -9759 (p. 2 of 4)	
R	Bethesda Property Deed dated August 30, 2018	
S	Bethesda Property Deed dated July 22, 2019	
T	February 2020 statement BBVA account ending -2888 (p. 2 of 3) (TSI000180)	
U	February 2020 statement BBVA account ending -2888 (p. 2 of 3)	
V	February 2020 monthly transaction report BBVA account ending -2888 (TSI000891)	
W	February 2020 statement BBVA account ending -9759 (p. 3 of 4) (TSI000034)	
X	February 2020 statement BBVA account ending -9759 (p. 3 of 4)	
Y	Check numbers 2391, 2392 and 2393, dated March 19, 2018, March 20, 2018 and March 25, 2018 drawn from BBVA account ending -8953	

<sup>1</sup> Exhibit A through CC were attached to the Homony Declaration and are filed at Main Case D.I. 273; Adv. D.I. 4. Exhibit DD through KK are attached to this exhibit list.

Exhibit #	Title/Description	Reference
Z	March 2018 monthly transaction report BBVA account ending - 8953 (TSI000940 to TSI000941)	
AA	May 2021 statement BBVA account ending -2888 (p. 2 of 3) (TSI000138)	
BB	May 2021 statement BBVA account ending -2888 (p. 2 of 3)	
CC	May 2021 monthly transaction report BBVA account ending - 2888 (TSI000881)	
DD	July 2020 statement TD Bank account ending -3152	Attached hereto
EE	September 2020 statement TD Bank account ending -3053	Attached hereto
FF	May 2021 statement TD Bank account ending -3053	Attached hereto
GG	May 2021 statement TD Bank account ending -3152	Attached hereto
HH	Summary of transfers concealed from Trustee and creditors	Attached hereto
II	April 2019 statement TD Bank account ending -3152	Attached hereto
JJ	Statement of Financial Affairs	D.I. 29 and attached hereto
KK	Exhibit A to the Complaint including an additional column with the descriptions, if any, of the transfers from the Debtor's Monthly Transaction Reports	Attached hereto

### **TRUSTEE'S WITNESS LIST**

Witness	Testimony
William A. Homony, CIRA	Mr. Homony is a principal of Miller Coffey Tate LLP, accountants and bankruptcy consultants to the Chapter 7 Trustee. Mr. Homony may testify as to the PI Motion, any objection thereto, and any other testimony regarding the same.

Dated: January 20, 2023

**ARCHER & GREINER, P.C.**

/s/ Bryan J. Hall

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